

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GREGORY T. BROWN, Jr.,

Plaintiff,

v.

COMMONWEALTH OF MASSACHUSETTS,
FRANK G. COUSINS, Jr., MICHAEL MARKS,
FRANK L. WATERMAN, KEVIN G. CLARK,
JORDAN CORREIA, and NATHANEL KARGBO,

Defendants.

CIVIL ACTION
NO. 11-11019-JGD

PLAINTIFF'S PROPOSED VOIR DIRE

1. Do you believe that a person should lose their constitutional rights if they are incarcerated?
2. Have you or any close family member or any close friends ever been employed in the field of law enforcement or correctional services? If so, please state when, the name of your employer and give a brief description of the employment and your training for it. Are you or they still currently involved in law enforcement or correctional services? If not, why not?
3. Would you give greater credence to the testimony of a law enforcement official because of the fact that they are law enforcement, as compared to the testimony of the plaintiff or other non-law enforcement personnel?
4. Would you give greater credibility to the testimony of a corrections officer than you would the testimony of any other person?
5. Do you think people convicted of crimes can tell the truth? Does a former inmate have the ability to tell the truth?
6. Do you have trouble believing someone when you know or might believe that they have been convicted of a crime?

7. This is a civil case in which the only way for Mr. Brown to recover is for the Jury to make an award of money damages. Would you be comfortable making such an award if the evidence and the law supported it? Is your answer still the same despite the fact that Mr. Brown was an inmate at Essex County Correctional Facility?
8. Plaintiff Gregory T. Brown, Jr., was an inmate at the Essex County Correctional Facility at the time this incident occurred. This case involves a claim by Mr. Brown that the defendants, officers employed at the facility, deprived him of his constitutional rights. This is not a criminal case in which you will be asked to judge the guilt or innocence of anyone. Do you have any personal feelings, beliefs, or concerns that would prevent you from sitting on this type of a case?

Respectfully Submitted,

Dated: July 16, 2013

/s/ John R. Bitá
John R. Bitá (BBO #667886)
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Attorney for Plaintiff Gregory T. Brown, Jr.

CERTIFICATE OF SERVICE

I, John R. Bitá, hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) and paper copies will be sent to those indicated as non-registered participants on July 16, 2013.

Dated: July 16, 2013

/s/ John R. Bitá
John R. Bitá